

LETTER TO THE HONORABLE
NAOMI REICE BUCHWALD,
dated December 26, 2024

Exhibit B

GRY AHLEFELD-ENGEL 30(b)(6)
Stein v Skatteforvaltningen

May 30, 2024

1-4

Page 1	Page 3
<p>1 2 UNITED STATES DISTRICT COURT 3 SOUTHERN DISTRICT OF NEW YORK 4 - - - - -) 5 MATTHEW STEIN and JEROME LHOTE,) 6 Plaintiffs,) Case No.: 7 v.) 23 Civ. (NRB) 8 SKATTEFORVALTNINGEN,) 9 Defendant.) 10 and) 11 LUKE MCGEE,) 12 Nominal Defendant.) 13 - - - - -) 14 SKATTEFORVALTNINGEN,) 15 Counterclaim Plaintiff,) 16 v.) 17 MATTHEW STEIN, JEROME LHOTE,) 18 and LUKE MCGEE,) 19 Counterclaim Defendants.) 20 - - - - -) 21 VIDEOTAPED 30(b)(6) DEPOSITION OF 22 SKATTEFORVALTNINGEN by GRY AHLEFELD-ENGEL 23 24 Reported by: Kim M. Brantley 25 Job No: J11294056</p>	<p>1 GRY AHLEFELD-ENGEL 30(b)(6) 2 APPEARANCES: 3 For Plaintiffs/Counterclaim Defendants 4 Matthew Stein and Jerome Lhote: 5 MCKOOL SMITH, PC 6 1301 Avenue of the Americas 32nd FL 7 New York, New York 10019 8 (212) 402-9412 9 Email: dlevy@mckoolsmith.com 10 ovisconti@mckoolsmith.com 11 BY: DANIEL LEVY, ESQUIRE 12 OLIVIA VISCONTI, ESQUIRE 13 14 For Defendant/Counterclaim Plaintiff 15 Skatteforvaltningen: 16 HUGHES HUBBARD & REED, LLP 17 One Battery Park Plaza 18 New York, New York 10004 19 (212) 837-6843 20 Email: marc.weinstein@hugheshubbard.com 21 neil.oxford@hugheshubbard.com 22 kiran.rosenkilde@hugheshubbard.com 23 BY: MARC A. WEINSTEIN, ESQUIRE 24 NEIL J. OXFORD, ESQUIRE 25 KIRAN ROSENKILDE, ESQUIRE</p>
Page 2	Page 4
<p>1 GRY AHLEFELD-ENGEL 30(b)(6) 2 Thursday, May 30, 2024 3 Time: 9:36 a.m. 4 Videotaped 30(b)(6) deposition of 5 SKATTEFORVALTNINGEN, by GRY AHLEFELD-ENGEL, held 6 at Hughes Hubbard & Reed, One Battery Park Plaza, 7 New York, New York, before Kim M. Brantley, Court 8 Reporter and Notary Public of the State of New 9 York. 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>1 GRY AHLEFELD-ENGEL 30(b)(6) 2 APPEARANCES CONTINUED: 3 For Nominal Defendant/Counterclaim Defendant 4 Luke McGee: 5 NELSON MULLINS RILEY & SCARBOROUGH, LLP 6 2 S Biscayne Blvd. - 21st Floor 7 Miami, Florida 33131 8 (305) 373-9400 9 Email: dan.newman@nelsonmullins.com 10 justin.kaplan@nelsonmullins.com 11 edgar.neely@nelsonmullins.com 12 BY: DANIEL NEWMAN, ESQUIRE 13 JUSTIN B. KAPLAN, ESQUIRE 14 EDGAR A. NEELY, IV, ESQUIRE (Georgia) 15 (Attending via Zoom) 16 ALSO PRESENT: 17 Counsel from Kammeradvokaten (Denmark) 18 KATRINE HENCKEL HARLOFF, ESQUIRE 19 ANNE CHRISTINE K. EGHOLM, ESQUIRE 20 MIKKEL D. FANO, ESQUIRE 21 (Attending via Zoom) 22 and 23 MATTHEW STEIN, Plaintiff 24 JEROME LHOTE, Plaintiff 25 (Attending via Zoom)</p>

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May 30, 2024
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<p style="text-align: right;">Page 5</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 APPEARANCES CONTINUED:</p> <p>3 CATLIN MYERS, Hughes Hubbard & Reed</p> <p>4 and</p> <p>5 ANETTE CHRISTENSEN, Interpreter of Danish</p> <p>6 (Appearing via Zoom)</p> <p>7 and</p> <p>8 CHARLES BOWMAN, Legal Video Specialist</p> <p>9 Esquire Deposition Solutions</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 7</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 MR. LEVY: I'll note for the record</p> <p>3 that Mr. Stein is present.</p> <p>4 MR. WEINSTEIN: Marc Weinstein, Hughes</p> <p>5 Hubbard & Reed, for Skatte.</p> <p>6 MR. OXFORD: Neil Oxford, Hughes</p> <p>7 Hubbard & Reed, for Skatte.</p> <p>8 MS. HARLOFF: Katrine Henckel Harloff</p> <p>9 for Kammeradvokaten.</p> <p>10 MS. EGHOLM: Anne Christine Egholm,</p> <p>11 also Kammeradvokaten, for Skatte.</p> <p>12 MR. ROSENKILDE: Kiran Rosenkilde,</p> <p>13 Hughes Hubbard & Reed for Skatte. And we're</p> <p>14 joined by a summer associate who's observing.</p> <p>15 MR. MYERS: Catlin Myers.</p> <p>16 THE COURT REPORTER: And could you</p> <p>17 raise your right hand, please. I'm going to</p> <p>18 swear you in --</p> <p>19 First, let me swear the interpreter. I</p> <p>20 will swear the interpreter. I cannot see the</p> <p>21 interpreter, but I will ask her to please</p> <p>22 raise her right hand. Ms. Christensen, can</p> <p>23 you please raise your right hand --</p> <p>24 THE INTERPRETER: Yes.</p> <p>25 THE COURT REPORTER: So that I can</p>
<p style="text-align: right;">Page 6</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 P R O C E E D I N G S</p> <p>3 THE LEGAL VIDEO SPECIALIST: We are now</p> <p>4 on the record. The time is 9:36 a.m., on May</p> <p>5 30th, 2024. This is the videotaped deposition of</p> <p>6 Gry Ahlefeld-Engel, taken in the matter of Stein</p> <p>7 and Lhote v. Skatteforvaltningen, in the United</p> <p>8 States District Court, Southern District of New</p> <p>9 York.</p> <p>10 My name is Charlie Bowman, and I'm your</p> <p>11 videographer today. The court reporter is Kim</p> <p>12 Brantley. We are representing Esquire Deposition</p> <p>13 Solutions.</p> <p>14 Counsel, please identify yourselves for</p> <p>15 the record with affiliations, and then the witness</p> <p>16 will be sworn in.</p> <p>17 MR. LEVY: Good morning. Daniel Levy,</p> <p>18 the law firm McKool Smith for Matthew Stein,</p> <p>19 S-t-e-i-n, and Jerome Lhote, L-h-o-t-e.</p> <p>20 MS. VISCONTI: Olivia Visconti, for</p> <p>21 Matthew Stein and for Jerome Lhote.</p> <p>22 MR. NEWMAN: Dan Newman from Nelson</p> <p>23 Mullins, on behalf of Luke McGee.</p> <p>24 MR. KAPLAN: Justin Kaplan from Nelson</p> <p>25 Mullins, on behalf of Luke McGee.</p>	<p style="text-align: right;">Page 8</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 swear you in.</p> <p>3 ANETTE CHRISTENSEN,</p> <p>4 called as the official interpreter of Danish, did</p> <p>5 swear to translate the questions in this case from</p> <p>6 English to Danish, and the answers from Danish to</p> <p>7 English, to the best of her ability.</p> <p>8 (Note that interpreter will only</p> <p>9 interpret the proceedings upon request by the</p> <p>10 witness and the attorneys.)</p> <p>11 GRY AHLEFELD-ENGLE,</p> <p>12 called as a witness by Counsel for the Plaintiffs,</p> <p>13 and, after having been first duly sworn by the</p> <p>14 Notary Public, was examined and testified as</p> <p>15 follows:</p> <p>16 MR. LEVY: Could I ask the videographer</p> <p>17 to identify the people present on Zoom. Thank</p> <p>18 you.</p> <p>19 THE LEGAL VIDEO SPECIALIST: The people</p> <p>20 I have present on Zoom are Edgar Neely, Jerome</p> <p>21 Lhote, and Mikkel D. Fano, Kammeradvokaten.</p> <p>22 That's all I have.</p> <p>23 THE COURT REPORTER: And the</p> <p>24 interpreter.</p> <p>25 THE LEGAL VIDEO SPECIALIST: And the</p>

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<p style="text-align: right;">Page 9</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 interpreter, who has already been introduced.</p> <p>3 MR. LEVY: Very good. Thank you.</p> <p>4 And the plaintiffs have no objection to</p> <p>5 the manner of the taking of the -- of the</p> <p>6 oath of the interpreter, who's located</p> <p>7 outside the United States, correct?</p> <p>8 MR. WEINSTEIN: Well, you're the</p> <p>9 plaintiffs, but it's correct that we -- we do</p> <p>10 not.</p> <p>11 MR. LEVY: I'm -- I'm saying that the</p> <p>12 plaintiffs have no objection to the taking of</p> <p>13 the oath of the interpreter.</p> <p>14 MR. WEINSTEIN: Yeah.</p> <p>15 MR. LEVY: Who's located outside the</p> <p>16 United States. I'm saying that for the</p> <p>17 record on behalf of the plaintiffs.</p> <p>18 MR. WEINSTEIN: Yes.</p> <p>19 MR. LEVY: And I'm going to ask you to</p> <p>20 indicate the same.</p> <p>21 MR. WEINSTEIN: Yes.</p> <p>22 MR. LEVY: Okay, very good. Thank you.</p> <p>23 And you confirm she's not located in the</p> <p>24 United States?</p> <p>25 MR. WEINSTEIN: Correct.</p>	<p style="text-align: right;">Page 11</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 EXAMINATION BY COUNSEL FOR PLAINTIFFS:</p> <p>3 BY MR. LEVY:</p> <p>4 Q. I just want to make sure we get some</p> <p>5 pronunciations and some terms correct. You</p> <p>6 pronounce your last name Ahlefeld-Engel?</p> <p>7 A. Yes.</p> <p>8 Q. And so I can address you as Ms.</p> <p>9 Ahlefeld-Engel, or should I just address you as</p> <p>10 Ms. Ahlefeld?</p> <p>11 A. Ahlefeld-Engel, would be the --</p> <p>12 Q. Okay, perfect. I will do that. Very</p> <p>13 good. Thank you.</p> <p>14 And you're here as a representative --</p> <p>15 testifying as a -- in your -- in a representative</p> <p>16 capacity on behalf of an entity, correct?</p> <p>17 A. Yes.</p> <p>18 Q. And could you identify the name of the</p> <p>19 entity that you're testifying on behalf of?</p> <p>20 A. Skatteforvaltningen.</p> <p>21 Q. Very good. If -- if I just refer to</p> <p>22 that as "Skatte," can we agree that that's the</p> <p>23 correct entity?</p> <p>24 A. We can agree on that, yes.</p> <p>25 Q. Okay. Is it commonly known as Skatte?</p>
<p style="text-align: right;">Page 10</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 MR. LEVY: Okay, very good. Thank you.</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 12</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 A. It used to be.</p> <p>3 Q. Okay. And -- and is it known</p> <p>4 something -- by something else now?</p> <p>5 A. Skatteforvaltningen.</p> <p>6 Q. Okay. People don't refer to -- to it</p> <p>7 in common parlance as -- as Skatte?</p> <p>8 A. Well, the -- yes, a Danish person would</p> <p>9 refer to it as "Skatte".</p> <p>10 Q. Okay, very good. Thank you.</p> <p>11 We're going to be working with some</p> <p>12 questions and answers today.</p> <p>13 A. Yes.</p> <p>14 Q. So I want to make sure we have some</p> <p>15 ground rules so that we can be as efficient as we</p> <p>16 possibly can.</p> <p>17 A. Okay.</p> <p>18 Q. Okay? You're under oath. I'm entitled</p> <p>19 to truthful testimony, and the plaintiffs are.</p> <p>20 You're entitled to clear questions that you can</p> <p>21 understand. So if there's some aspect of a</p> <p>22 question that I ask you that you don't understand,</p> <p>23 please just tell me, and I'll rephrase it, or if</p> <p>24 there's a word that I use in English that you</p> <p>25 don't know -- you're aware there's a translator</p>

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<p style="text-align: right;">Page 109</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 that I am.</p> <p>3 Q. But -- but at the time that the text of</p> <p>4 8(f) was shared with SOIK, you have no</p> <p>5 recollection that --</p> <p>6 A. I have no recollection of --</p> <p>7 MR. WEINSTEIN: He didn't finish his</p> <p>8 question.</p> <p>9 THE WITNESS: Oh, I'm sorry.</p> <p>10 BY MR. LEVY:</p> <p>11 Q. You have no recollection that in</p> <p>12 Skatte's mind Skatte intended to comply with</p> <p>13 section 8(f) by sharing the text of 8(f)?</p> <p>14 A. No, I have no recollection of me at the</p> <p>15 time thinking when I'm doing this, I'm complying</p> <p>16 with 8(f).</p> <p>17 Q. And did anyone else?</p> <p>18 A. I don't know.</p> <p>19 Q. Well, you're here as a representative</p> <p>20 of Skatte, right?</p> <p>21 A. Yeah.</p> <p>22 Q. Okay. So did you talk to anyone in</p> <p>23 order to find out the answer about what others</p> <p>24 thought the sharing of section 8(f) meant?</p> <p>25 A. In preparing for this?</p>	<p style="text-align: right;">Page 111</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 Fiig. I think it was in or around April 20th, I'm</p> <p>3 sending Per Fiig the excerpts. I don't know if</p> <p>4 it's exactly the same as these, but an excerpt</p> <p>5 about the -- about the former -- was it 8(d) at</p> <p>6 the time that became 8(f) on -- I don't know if on</p> <p>7 the same day or at a later date, but in close</p> <p>8 connection to I sent Per Fiig the list of the</p> <p>9 covered parties --</p> <p>10 Q. Mm-hmm.</p> <p>11 A. -- of the -- of the settlement.</p> <p>12 Q. And at the time that occurred, did --</p> <p>13 MR. WEINSTEIN: Just sorry. Were you</p> <p>14 done with your answer?</p> <p>15 THE WITNESS: Not completely done</p> <p>16 with --</p> <p>17 BY MR. LEVY:</p> <p>18 Q. Please go ahead. Sorry.</p> <p>19 A. -- the whole -- the whole --</p> <p>20 Q. Sure, give me your list.</p> <p>21 A. I'm giving you my list.</p> <p>22 In the days up to the final execution</p> <p>23 of the settlement or the signing of the</p> <p>24 settlement, there is -- as you pointed out</p> <p>25 yourself earlier -- correspondence going back and</p>
<p style="text-align: right;">Page 110</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 Q. Uh-huh.</p> <p>3 A. No, I haven't talked to anybody about</p> <p>4 the -- what they thought about the sharing of</p> <p>5 this.</p> <p>6 Q. Other than looking in documents and</p> <p>7 meeting with your counsel, did you talk to anyone</p> <p>8 in preparation for your testimony?</p> <p>9 A. No, I didn't talk to anybody in</p> <p>10 preparation about the subject matters --</p> <p>11 Q. Okay.</p> <p>12 A. -- of my deposition, no.</p> <p>13 Q. Okay. Very good. Thank you.</p> <p>14 So -- so, did anyone ever formulate --</p> <p>15 anyone -- withdrawn.</p> <p>16 Did Skatte ever formulate a plan about</p> <p>17 how it was intending to comply with Section 8(f)?</p> <p>18 A. No.</p> <p>19 Q. And -- and tell me, ma'am, when Skatte</p> <p>20 did comply with Section 8(f).</p> <p>21 A. When did it comply with Section 8(f)?</p> <p>22 Q. Uh-huh.</p> <p>23 A. I think we complied with Section 8(f)</p> <p>24 by several -- several communications to SOIK, one</p> <p>25 being me sending the text of this email to Per</p>	<p style="text-align: right;">Page 112</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 forth between Steen, and Morten, and SOIK about</p> <p>3 the press release that is later in fact executed</p> <p>4 on May 29th after the settlement was signed in</p> <p>5 which we list the main terms of the settlement --</p> <p>6 settlement amount; number of settling parties that</p> <p>7 I have previously sent to Mr. Fiig; what the</p> <p>8 settled amount represents -- it is what the</p> <p>9 settling parties received out of the total sum of</p> <p>10 the 2.9 -- that the settling parties have agreed</p> <p>11 to cooperate with Skatte about its ongoing cases;</p> <p>12 that we find that this settlement is a victory for</p> <p>13 Skatte. It's a good settlement.</p> <p>14 So that is the total of -- of how I</p> <p>15 find that we do comply --</p> <p>16 Q. And when you say --</p> <p>17 A. -- with 8(f).</p> <p>18 Q. Are you done?</p> <p>19 A. Now I'm done.</p> <p>20 Q. Okay, very good.</p> <p>21 And when you say you find that, when</p> <p>22 was the first time that you concluded that sending</p> <p>23 the text of these provisions -- I'm going to show</p> <p>24 you the email in a moment.</p> <p>25 A. Yeah.</p>

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1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK
4 - - - - -)
5 MATTHEW STEIN and JEROME LHOTE,)
6 Plaintiffs,) Case No.:
7 v.) 23 Civ. (NRB)
8 SKATTEFORVALTNINGEN,) Vol. 2
9 Defendant.)
10 and)
11 LUKE MCGEE,)
12 Nominal Defendant.)
13 - - - - -)
14 SKATTEFORVALTNINGEN,)
15 Counterclaim Plaintiff,)
16 v.)
17 MATTHEW STEIN, JEROME LHOTE,)
18 and LUKE MCGEE,)
19 Counterclaim Defendants.)
20 - - - - -)
21 CONTINUED VIDEOTAPED 30(b)(6) DEPOSITION OF
22 SKATTEFORVALTNINGEN by GRY AHLEFELD-ENGEL
23
24 Reported by: Kim M. Brantley
25 Job No: J11294061

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1 GRY AHLEFELD-ENGEL 30(b)(6)
2 Friday, May 31, 2024
3 Time: 9:13 a.m.
4 Continued videotaped 30(b)(6) deposition of
5 SKATTEFORVALTNINGEN, by GRY AHLEFELD-ENGEL, held
6 at Hughes Hubbard & Reed, One Battery Park Plaza,
7 New York, New York, before Kim M. Brantley, Court
8 Reporter and Notary Public of the State of New
9 York.
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1 GRY AHLEFELD-ENGEL 30(b)(6)
2 APPEARANCES:
3 For Plaintiffs/Counterclaim Defendants
4 Matthew Stein and Jerome Lhote:
5 MCKOOL SMITH, PC
6 1301 Avenue of the Americas 32nd FL
7 New York, New York 10019
8 (212) 402-9412
9 Email: dlevy@mckoolsmith.com
10 ovisconti@mckoolsmith.com
11 BY: DANIEL LEVY, ESQUIRE
12 OLIVIA VISCONTI, ESQUIRE
13
14 For Defendant/Counterclaim Plaintiff
15 Skatteforvaltningen:
16 HUGHES HUBBARD & REED, LLP
17 One Battery Park Plaza
18 New York, New York 10004
19 (212) 837-6843
20 Email: marc.weinstein@hugheshubbard.com
21 neil.oxford@hugheshubbard.com
22 kiran.rosenkilde@hugheshubbard.com
23 BY: MARC A. WEINSTEIN, ESQUIRE
24 NEIL J. OXFORD, ESQUIRE
25 KIRAN ROSENKILDE, ESQUIRE

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1 GRY AHLEFELD-ENGEL 30(b)(6)
2 APPEARANCES CONTINUED:
3 For Nominal Defendant/Counterclaim Defendant
4 Luke McGee:
5 NELSON MULLINS RILEY & SCARBOROUGH, LLP
6 2 S Biscayne Blvd. - 21st Floor
7 Miami, Florida 33131
8 (305) 373-9400
9 Email: dan.newman@nelsonmullins.com
10 justin.kaplan@nelsonmullins.com
11 edgar.neely@nelsonmullins.com
12 BY: DANIEL NEWMAN, ESQUIRE
13 JUSTIN B. KAPLAN, ESQUIRE
14 EDGAR A. NEELY, IV, ESQUIRE (Georgia)
15 (Attending via Zoom)
16 ALSO PRESENT:
17 Counsel from Kammeradvokaten (Denmark)
18 KATRINE HENCKEL HARLOFF, ESQUIRE
19 ANNE CHRISTINE K. EGHOLM, ESQUIRE
20 MIKKEL D. FANO, ESQUIRE
21 (Attending via Zoom)
22 and
23 MATTHEW STEIN, Plaintiff
24 JEROME LHOTE, Plaintiff
25 (Both attending via Zoom)

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<p style="text-align: right;">Page 293</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 APPEARANCES CONTINUED:</p> <p>3 ANETTE CHRISTENSEN, Interpreter of Danish</p> <p>4 (Appearing via Zoom)</p> <p>5 and</p> <p>6 CHARLES BOWMAN, Legal Video Specialist</p> <p>7 Esquire Deposition Solutions</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 295</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 Hubbard Reed, for Skatte.</p> <p>3 MS. HARLOFF: Katrine Henckel Harloff,</p> <p>4 for Kammeradvocaten, Skatte.</p> <p>5 MS. EGHOLM: Anne Kristine Egholm,</p> <p>6 Kammeradvokaten, Skatte.</p> <p>7 MR. ROSENKILDE: Kiran Rosenkilde,</p> <p>8 Hughes Hubbard & Reed, for Skatte.</p> <p>9 MR. LEVY: Can I ask the videographer</p> <p>10 to identify those who are present by Zoom.</p> <p>11 THE LEGAL VIDEO SPECIALIST: Yes, sir.</p> <p>12 Anette Christensen, Edgar Neely --</p> <p>13 THE INTERPRETER: Yes.</p> <p>14 THE LEGAL VIDEO SPECIALIST: -- Edgar</p> <p>15 Neely, Matt Stein, Mikkel D. Fano.</p> <p>16 MR. LEVY: There's no one else?</p> <p>17 THE LEGAL VIDEO SPECIALIST: That's it.</p> <p>18 MR. LEVY: Okay, very good. Thank you.</p> <p>19 And Mr. Neely is from Nelson Mullins on</p> <p>20 behalf of Mr. McGee.</p> <p>21 ANETTE CHRISTENSEN,</p> <p>22 called as the official interpreter of Danish, did</p> <p>23 swear to translate the questions in this case from</p> <p>24 English to Danish, and the answers from Danish to</p> <p>25 English, to the best of her ability.</p>
<p style="text-align: right;">Page 294</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 P R O C E E D I N G S</p> <p>3 THE LEGAL VIDEO SPECIALIST: We are now</p> <p>4 on the record. The time is 9:13 a.m. on May</p> <p>5 31st, 2024.</p> <p>6 This is the continuation of the</p> <p>7 videotaped deposition of Gry Ahlefeld-Engel,</p> <p>8 taken in the matter of Stein and Lhote v.</p> <p>9 Skatteforvaltningen, in the United States</p> <p>10 District Court, Southern District, New York.</p> <p>11 My name is Charlie Bowman, and I'm your</p> <p>12 videographer today. The court reporter is</p> <p>13 Kim Brantley. We are representing Esquire</p> <p>14 Deposition Solutions.</p> <p>15 Would counsel please introduce</p> <p>16 yourselves and affiliations, and then the</p> <p>17 witness will be sworn in.</p> <p>18 MR. LEVY: Good morning. Daniel Levy,</p> <p>19 and Olivia Visconti from McKool Smith for Mr.</p> <p>20 Stein and Mr. Lhote.</p> <p>21 MR. NEWMAN: Dan Newman from Nelson</p> <p>22 Mullins on behalf of Luke McGee.</p> <p>23 MR. KAPLAN: Justin Kaplan from Nelson</p> <p>24 Mullins on behalf of Luke McGee.</p> <p>25 MR. WEINSTEIN: Mark Weinstein, Hughes</p>	<p style="text-align: right;">Page 296</p> <p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 (Note that interpreter will only</p> <p>3 interpret the proceedings upon request by the</p> <p>4 witness and the attorneys.)</p> <p>5 GRY AHLEFELD-ENGLE,</p> <p>6 called as a witness by Counsel for the Plaintiffs,</p> <p>7 and, after having been first duly sworn by the</p> <p>8 Notary Public, was examined and testified as</p> <p>9 follows:</p> <p>10 EXAMINATION BY COUNSEL FOR PLAINTIFFS</p> <p>11 BY MR. LEVY:</p> <p>12 Q. Could I ask you to take out Exhibit 105</p> <p>13 from yesterday. I hope you have a pile.</p> <p>14 A. I do.</p> <p>15 Q. I know that you -- you said yesterday</p> <p>16 you were very meticulous, and you made a pile and</p> <p>17 put them all in order.</p> <p>18 A. I am.</p> <p>19 Q. You put them in reverse order.</p> <p>20 A. Well, the first one at the bottom.</p> <p>21 Q. Yeah. And can I ask you to look at</p> <p>22 item number two in your May 15th, 2019 email to</p> <p>23 Mr. Fiig. It begins in English, "With respect</p> <p>24 to."</p> <p>25 A. Yes.</p>

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2 email was correct.

3 Q. Was -- was it intended to evident -- to

4 provide some evidence of Skatte's compliance with

5 section 8(f)?

6 A. I have no knowledge of what it was

7 intended. I know it was an email that was to be

8 sent.

9 Q. And you reviewed this email prior to

10 its being sent?

11 A. I was asked if the consents thereof was

12 a fair representation, if that was true, and I

13 said yes.

14 Q. It -- it refers to "good faith

15 negotiations and the obligation to provide

16 information in cooperation," correct?

17 (Witness reviews document.)

18 A. That's what it says, yes.

19 Q. And those are terms that are used in

20 section 8(f)?

21 A. Correct.

22 Q. Do you have any doubt that this was

23 sent by counsel for Skatte in order to provide

24 some evidence that 8(f) had been complied with?

25 A. Again, I don't --

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 MR. WEINSTEIN: Objection.

3 THE WITNESS: I don't -- as I said, I

4 don't know what it was -- the specific

5 questions it was in answer to. I was asked

6 to -- if this was true to my knowledge, and I

7 said yes.

8 BY MR. LEVY:

9 Q. It doesn't refer to your providing Mr.

10 Fiig's -- Fiig with the text of section 8(f) prior

11 to the signing of the settlement agreement, does

12 it?

13 A. No, it does not.

14 Q. And it doesn't refer to your providing

15 to Mr. Fiig a copy of the covered parties -- a

16 list of the covered parties prior to the execution

17 of the settlement agreement, correct?

18 A. Not specifically, no.

19 Q. And it doesn't refer to anything in

20 relation to the press release, correct?

21 A. Not specifically, no.

22 Q. This is intended to mislead Matt and

23 Jerome's counsel, is it not?

24 MR. WEINSTEIN: Objection.

25 THE WITNESS: That's your opinion. Why

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 is it -- why is it --

3 BY MR. LEVY:

4 Q. I'm -- I'm --

5 A. Is it intended to mislead?

6 Q. I'm asking you if this was crafted with

7 the intent of misleading Matt and Jerome's

8 counsel?

9 A. No.

10 MR. WEINSTEIN: Objection.

11 BY MR. LEVY:

12 Q. Who would know the -- what the intent

13 behind this email was?

14 MR. WEINSTEIN: Objection.

15 THE WITNESS: I don't know how to

16 answer that.

17 BY MR. LEVY:

18 Q. Well, would the writer of the -- of the

19 email know the intent?

20 MR. WEINSTEIN: Objection.

21 THE WITNESS: What the intent of it

22 was? We were -- again, I was asked to

23 provide information if this was true to the

24 best of my knowledge, and I said yes.

25 The intent behind it, I have -- I have

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1 GRY AHLEFELD-ENGEL 30(b)(6)

2 no way to testify towards that.

3 BY MR. LEVY:

4 Q. Only the author of the -- the email

5 would know, correct?

6 MR. WEINSTEIN: Objection.

7 THE WITNESS: I don't know how to

8 answer that question. I can't testify to it.

9 BY MR. LEVY:

10 Q. Very good. Thank you.

11 MR. LEVY: Can you give me the

12 Affidavit of Confession of Judgment.

13 We're at -- we're at 6:40?

14 THE LEGAL VIDEO SPECIALIST: Yes.

15 MR. LEVY: Okay. Can you give me just

16 this last little bit? Okay. Thank you.

17 BY MR. LEVY:

18 Q. Let me show you what I'm going to ask

19 the reporter to mark as --

20 THE COURT REPORTER: One twenty-nine.

21 MR. LEVY: One twenty-nine.

22 (Affidavit of Confession of Judgment

23 was marked Skatte Exhibit 129, for

24 identification.)

25 BY MR. LEVY:

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<p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 Q. Do you recognize this?</p> <p>3 A. Yes, I do.</p> <p>4 Q. It's dated in or about June 2021?</p> <p>5 A. Where do I see the date?</p> <p>6 Q. It's towards the back?</p> <p>7 A. Yes.</p> <p>8 Q. And you're aware -- you were aware at</p> <p>9 the time -- withdrawn.</p> <p>10 Did you see this at the time that it</p> <p>11 was executed -- withdrawn.</p> <p>12 Did Skatte see this at the time that it</p> <p>13 was executed?</p> <p>14 A. Skatte's counsel did, I presume, but I</p> <p>15 don't know that we saw it, the document itself.</p> <p>16 Q. Skatte the entity your not sure. How</p> <p>17 do you -- how do you know that Skatte's counsel</p> <p>18 did?</p> <p>19 A. I suppose it's related to the case.</p> <p>20 It's the Confession of Judgment. But again,</p> <p>21 that's not something we would typically get.</p> <p>22 Q. Why not?</p> <p>23 A. In Skatte.</p> <p>24 Q. Why not?</p> <p>25 A. Because that's an -- that's a -- we</p>	<p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 A. In preparation of this deposition.</p> <p>3 Q. And Skatte was not aware prior to that?</p> <p>4 A. No.</p> <p>5 Q. And Skatte was not aware at the time</p> <p>6 that this was executed that the change in law</p> <p>7 relating to affidavits of confession of judgment</p> <p>8 could impact the enforceability of this</p> <p>9 agreement -- withdrawn.</p> <p>10 Skatte was not aware at the time that</p> <p>11 this was executed that the -- that the change in</p> <p>12 law could impact the enforceability of the</p> <p>13 affidavit of confession of judgment?</p> <p>14 MR. WEINSTEIN: Objection.</p> <p>15 THE WITNESS: I think I need to have</p> <p>16 that translated.</p> <p>17 MR. LEVY: Okay, very good.</p> <p>18 Can I ask the reporter to repeat back</p> <p>19 the question.</p> <p>20 THE COURT REPORTER: Just want to</p> <p>21 make -- is the interpreter there?</p> <p>22 MR. LEVY: Let us hope.</p> <p>23 THE INTERPRETER: Yes.</p> <p>24 THE COURT REPORTER: "Question: And</p> <p>25 Skatte was not aware at the time that this</p>
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<p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 called in representation counsel for that. That</p> <p>3 would not go to us.</p> <p>4 Q. Was -- was Skatte aware that -- that</p> <p>5 Mr. Lhote's residence had changed in between the</p> <p>6 time when the settlement agreement was executed</p> <p>7 and this agreement was executed?</p> <p>8 A. At the time?</p> <p>9 Q. Yeah.</p> <p>10 A. No.</p> <p>11 Q. You're aware of that now?</p> <p>12 A. I'm aware of that now, yes.</p> <p>13 Q. And at the time in or about June 2021,</p> <p>14 was Skatte aware that the law relating to</p> <p>15 affidavits of confession of judgment had changed?</p> <p>16 A. No.</p> <p>17 Q. You're aware now that the law relating</p> <p>18 to affidavits of confession of judgment had</p> <p>19 changed?</p> <p>20 MR. WEINSTEIN: Objection. She's not</p> <p>21 here to answer legal questions.</p> <p>22 BY MR. LEVY:</p> <p>23 Q. You may answer.</p> <p>24 A. I have been made aware.</p> <p>25 Q. When have you been made aware?</p>	<p>1 GRY AHLEFELD-ENGEL 30(b)(6)</p> <p>2 was executed that the change in law relating</p> <p>3 to affidavits of confession of judgment could</p> <p>4 impact the enforceability of this</p> <p>5 agreement -- withdrawn."</p> <p>6 Sorry. So this is the question...</p> <p>7 " Skatte was not aware at the time</p> <p>8 that this was executed that the change in law</p> <p>9 could impact the enforceability of the</p> <p>10 affidavit of confession of judgment?"</p> <p>11 (Question interpreted by the</p> <p>12 interpreter.)</p> <p>13 THE WITNESS: (In English) No, I was</p> <p>14 not aware of American law at the time.</p> <p>15 BY MR. LEVY:</p> <p>16 Q. Any knowledge of the change in law and</p> <p>17 is impact on the enforceability of the affidavit</p> <p>18 of confession of judgment would be possessed by</p> <p>19 your U.S. and Danish counsel?</p> <p>20 A. Correct.</p> <p>21 MR. WEINSTEIN: Objection.</p> <p>22 MR. LEVY: Thank you.</p> <p>23 Let's go off the record.</p> <p>24 THE LEGAL VIDEO SPECIALIST: We're off</p> <p>25 the record at 11:04 a.m.</p>